

October 3, 2007

Comments re: MM Docket No.01-317
Media Ownership

My name is James Gabbert. I have owned multiple radio and TV stations under the Pacific Fm Incorporated name. Stations that I have owned: KPEN (later changed to KIOD), KIQI, KOFY-TV, KOFY-AM, KOFY-FM, all San Francisco, KDIA, Oakland, KIKI, KPIG (now KIKI-FM), Honolulu. I was one of the founding members of the National Radio Broadcasters Association (merged with NAB in the mid-eighties), a member of former FCC Chairman Richard Wiley's Re-regulation Committee (in the 70's), Member of the House and Senate Communications sub-Committee Advisory Committee in 1974. The purpose of the Committee was to advise and guide legislation in the re-write of the 1934 Communications Act. In 1962 was recognized by the FCC, the Electronics Industry Association, the White House, and other organizations as the most successful station in the country to pioneer FM Stereo. Past President of the California Broadcasters Association, and recently inducted into the Bay Area Radio Hall of Fame. In short broadcasting has been my passion in life, just completed 50 years of being on radio and TV in the Bay Area.

When we started our first radio station, KPEN (now KIOD) in 1957, when FM was the "forgotten media" and we had over 50 separate owners of radio stations in the 9 counties of the Bay Area. Even that far back, the top 5 radio stations have most of the revenue. If a radio station was not in the top 10 it probably would not survive. That held true then and today. All during the 70's and 80's and early 90's these individual owners had to be creative, had to constantly compete for audience levels. A broadcaster could not stop creating, innovating, promoting and providing the American Public what they wanted. Unfortunately, today when multiple companies own up to 8 stations in a market, there is little room for competition, which is what provides diversity to the American Public. Today, it does not matter if radio station is in New York, San Francisco, or Grand Island NE, they all sound alike, creativity is non-existent because there really is no competition. Even if an individual were to own a powerhouse radio station in a major market and came up with an innovative popular format, all one of the large multiple owners has to do is copy the format on one of their stations in the same market. Also as they have a cluster of formats, they can drive an individual licensee out of business by offering the multiple stations to advertisers as a group with significant discounts. There are exceptions to this such as WBEB in Philadelphia but they were well established before the ownership rules were changed.

The bottom is that radio clusters in a market have destroyed diversity, creativity and innovation in radio!

Jim Gabbert